IN THE UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF TEXAS WACO DIVISION

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| § | CASE NO. 6:25-CV-00189 |
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SECOND DECLARATION OF ARTSIOM STAVENKA

I, Artsiom Stavenka, declare as follows:

- 1. My name is Artsiom Stavenka. I am over the age of twenty-one (21), of sound mind, and capable of an authorized to make this declaration. The facts stated in this declaration are within my personal knowledge and are true and correct.
- This second declaration is submitted in support of Kino-Mo's Motion to Dismiss for lack of Personal Jurisdiction and for improper venue.
- 3. Defendant Kino-Mo Ltd. ("Kino-Mo") is an entity formed under the laws of England and Wales, Registration No. 07517352. I am a director for Kino-Mo and have held this position from 2023 since my last appointment.
- 4. Kino-Mo never had any distributors operating in the state of Texas, only resellers.
- 5. We no longer have any authorized resellers in the state of Texas as all of our reseller agreements have ended several years ago.
- 6. Our Reseller agreement with co-defendant, Yoongli, was signed in 2018 for a 3 year period, never extended, and expired in 2021. *See* Exhibit A.

- Document 9-1
- 7. The reseller, EH. Teasley & Co., has not been an authorized reseller of ours since 2021. Our agreement was signed in 2019 for a 2 year term, never extended, and expired in 2021. See Exhibit B.
- 8. The Canadian reseller, Go2 Productions, has not been an authorized reseller of ours since 2019. Our agreement was signed in 2018 for a 1 year term, never extended, and expired in 2019. See Exhibit C.
- 9. Kino-Mo leases a warehouse 6425 Montessouri Street, Las Vegas, NV 89113. Payments and shipments are regularly made to this location. See Exhibits D, E.
- 10. Kino-Mo has an authorized partner (Kre8 Media) in Nevada which runs a permanent walk-in showroom with our products for people in Las Vegas to visit. We do not have any authorized partners in Texas and have never had any showrooms in Texas.
- 11. We have participated at 15 trade shows in Nevada, showcased in Nevada every year since 2015 and have directly sold products in that jurisdiction.
- 12. We participated in the SXSW Trade Show in Austin, TX in 2023 but made no sales stemming from that event.
- 13. Kino-Mo holds several valid U.S. Patents: US11770045B2 and US11222559B2.
- 14. I hereby declare that all copies of documents in Exhibits A, B, C, D, and E attached to this declaration are good and true.
 - A. Exhibit A contains the redacted contract between Yoongli and Kino-Mo. Redacted portions contain non-pertinent business information. I would be happy to produce unredacted and full copies of the contract for an in-camera viewing at the Court's request.

- B. Exhibit B contains the redacted contract between EH. Teasley & Co. and Kino-Mo. Redacted portions contain non-pertinent business information. I would be happy to produce unredacted and full copies of the contract for an in-camera viewing at the Court's request.
- C. Exhibit C contains the redacted contract between Go2 Productions and Kino-Mo. Redacted portions contain non-pertinent business information. I would be happy to produce unredacted and full copies of the contract for an in-camera viewing at the Court's request.
- D. Exhibit D contains Redacted contracts and invoices for our Nevada warehouse. Redacted portions contain business and financial information. I would be happy to produce unredacted and full copies of the contract for an in-camera viewing at the Court's request.
- E. Exhibit D contains Redacted shipment information and waybills for our Nevada warehouse. Redacted portions contain business and personal information. I would be happy to produce unredacted and full copies of the contract for an in-camera viewing at the Court's request.
- 15. I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief.

Executed October 13, 2025

Artsiom Stavenka